

JUN-30-2011 01:40P FROM:

TO: 3886418

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1 CHARLES E. KELLY, ESQ.  
2 Nevada Bar No. 4652  
3 706 South Eighth Street  
4 Las Vegas, Nevada 89101  
5 (702) 385-0777  
6 Attorney for Defendant

7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA, ) No: 2:10-cr-217-PMP-PAL  
10 )

11 Plaintiff, )

12 vs. )

STIPULATION TO AMEND  
RELEASE CONDITIONS

13 )  
14 NIKOLAI MLADENOV, )

15 Defendant. )

16 COMES NOW, Defendant Nikolai Mladenov, by and through his counsel, Charles E.  
17 Kelly, and the United States, by and through Assistant United States Attorney, Eric Johnson, and  
18 hereby request that this Court approve this Stipulation to Amend the Release Conditions.  
19 Currently, the Defendant is under House Arrest with Electronic Monitoring. The Defendant has  
20 entered into a Plea Agreement with the Government. The House Arrest and Electronic  
21 Monitoring is no longer necessary in light of his entry of plea and further, the fact that he has  
22 made each and every court appearance notwithstanding that he resides in Sunnydale, CA. Any  
23 remaining conditions are to remain in effect.

24 WHEREFORE, Defendant Nikolai Mladenov and the United States request that this  
25 Court remove the House Arrest and Electronic Monitoring restrictions to his terms of release.  
26


27 Respectfully Submitted,  
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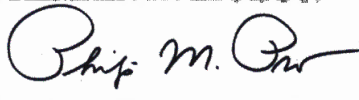
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1 Charles E. Kelly  
2 Bar No. 4652  
3 706 S. Eighth Street  
4 Las Vegas, NV 89101  
5 (702) 385-0777

6   
7 Eric Johnson  
8 Assistant United States Attorney

9 "THE ABOVE-MENTIONED REQUEST TO  
10 RELEASE THE DEFENDANT OF HOUSE ARREST  
11 AND ELECTRONIC MONITORING IS HEREBY  
12 GRANTED, ORDERED, AND ADJUDGED  
13 DECREED. ALL REMAINING CONDITIONS  
14 SHALL REMAIN IN EFFECT."

15   
16 PHILIP M. PRO  
17 UNITED STATES DISTRICT JUDGE

18 Dated: July 11, 2011.  
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